UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

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In re:	Chapter 11
EAGLE HEMP, LLC,	Case No. 8:23-bk-4137-RCT
TRIM LIFE LABS, LLC,	Case No. 8:23-bk-4138-RCT
Debtors.	Jointly Administered under
	/ Case No. 8:23-bk-4137-RCT

DEBTORS' MOTION FOR ORDER AUTHORIZING, SUBJECT TO HIGHER AND BETTER OFFERS, (I) THE SALE OF THE DEBTORS' PERISHABLE FINISHED PRODUCT AND RAW MATERIALS PURSUANT TO 11 U.S.C. § 363, FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES AND (II) THE ASSUMPTION AND ASSIGNMENT OF LEASE

Debtors, EAGLE HEMP, INC. ("Eagle Hemp") and TRIM LIFE LABS, LLC ("Trim Life" and with Eagle Hemp, together the "Debtors"), by and through their undersigned attorneys, respectfully request the entry of an order by this Court authorizing: (a) the sale by the Debtors of certain perishable finished product and raw materials to Arete E-Commerce Group, LLC (the "Purchaser"), subject to the terms and conditions of the offer set forth herein (the "Offer"), and subject to any higher or better offers for either or both of the Eagle Hemp assets and/or the Trim Life assets, free and clear of any and all claims (including "claims" as defined in § 101(5) of the Bankruptcy Code), mortgages, pledges, liens, security interests, interests, charges, encumbrances, setoffs, recoupments, cure claims, liabilities, debts, indebtedness, costs, damages, judgments or obligations of any character whatsoever and whenever arising, either before or after the Petition Date (collectively, the "Encumbrances"), pursuant to 11 U.S.C. § 363; and (b) the assumption and

¹Pursuant to the process outlined herein, the Offer from the Purchaser is subject to higher and better bids. Thus, the relief requested in this motion is also sought as to any such higher and better bids.

assignment of the lease for the premises located at 2855 Interstate Drive, Suite 111, Lakeland, Florida 33805 pursuant to that certain lease (the "Lease") between Eagle Hemp and Lakeland Interstate Business Center LLC, a Delaware limited liability company (the "Landlord"). In support of the relief sought in this Motion (the "Sale Motion"), the Debtors state as follows:

I. Preliminary Statement

1. By this Sale Motion, the Debtors seek entry of an order authorizing the sale of the Assets (as defined below), comprising certain perishable finished product and raw materials located at the leased location, to the Purchaser or to such other prospective purchaser(s) who is determined to have submitted a higher and better offer for the Assets by the Bid Deadline (as defined and set forth below). The Purchase Price to be paid under the Offer (defined below) totals \$375,000.00, consisting of one bid at \$262,500.00 for the EH Assets (defined below) and one at \$112,500.00 for the TL Assets (defined below), *plus* assignment and assumption of the Lease.

II. Jurisdiction and Venue

- 2. This Court has jurisdiction to consider this Sale Motion pursuant to 28 U.S.C. §§ 157 and 1334. The subject matter of this Sale Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. § 1408.
- 3. The statutory predicates for the relief sought in this Sale Motion include 11 U.S.C. §§ 105, 363, and 365; Rules 2002, 6004, and 6006 of the Federal Rules of Bankruptcy Procedure; and Local Rule 2002-1 and 6004-1 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida.

III. General Background

- 4. The Debtors filed their Voluntary Petitions for Relief under Chapter 11 of the Bankruptcy Code September 20, 2023 (the "Petition Date").
- 5. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.
- 6. Eagle Hemp is a Florida limited liability company which was formed in June of 2019. Eagle Hemp manufactures and sells ultra-purified full spectrum CBD products formulated with U.S. grown hemp and extracted using Good Manufacturing Practices at facilities certified to meet quality standards. The CBD products include tinctures, gummies, and topical cream. Eagle Hemp manufactures its products at the facility in Lakeland, Florida.
- 7. Trim Life is a Florida limited liability company which was formed in July of 2021. Trim Life markets and sells in the diet and health space with such products as apple cider vinegar gummies, Keto diet products, biotin products, melatonin gummies, and zinc tinctures.
- 8. The finished product of both Eagle Hemp and Trim Life are perishable in nature and have expiration dates that are primarily approaching mid-next year and would necessitate retesting, thereby further reducing the value of these items. The Debtors are unable to sell the product on a retail basis due to continued lack of credit card processing. The Offer put forward by the Purchaser provides for the Purchaser to assume Eagle Hemp's expenses related to the Lease, thereby relieving Eagle Hemp's estate from this administrative costs.

IV. Asset Description

9. Eagle Hemp seeks to sell the following assets comprised of finished products and raw materials:

FINISHED PRODUCTS – EAGLE HEMP			
PRODUCT	QUANTITY	EXP.	
		DATE	
CBD Gummies	125,955	30-Jun-24	
750Mg 30 Count			
CBD Gummies	72,360	30-Jun-24	
750Mg 30 Count			
CBD Relief Cream	52,000	30-Jun-24	
500 Mg 60mL			
CBD Tincture	0		
375Mg 30mL			
CBD Tincture	11,432	30-Jun-24	
750Mg 30mL			
CBDa Tincture	24,513	30-Jun-24	
750Mg 30mL			
CBD Tincture	0		
1500Mg 30mL			
CBD Pet Tincture	3,240	21-Dec-23	
375Mg 30mL			
CBD Pet	0		
Tincture750Mg			
30mL			

FINISHED RAW MATERIALS – EAGLE				
HEMP				
PRODUCT	QUANTITY			
Buckets/Lids - 5 Gallon	162			
Filter Aid FW20	51 Bags			
Filter Aid FP1	26 Bags			
Hemp - Trump	803 Bags			
Hemp - Cherry	764 Bags			
CBD Crude Oil (Kg)	1624.154			
Ethanol (Used, not usable in	100 Gallons			
future extractions)				

(collectively, the "EH Assets").

10. Trim Life seeks to sell the following assets comprised of finished products:

FINISHED PRODUCTS – TRIM LIFE			
PRODUCT	QUANTITY	EXP.	
		DATE	
ACV Gummies	43,800	31-Aug-24	

500mg 60 Count		
Keto+ACV	40,800	30-Aug-24
Gummies 60 Count		
Keto BHB Salts	136,050	31-Mar-24
Capsules 800Mg 60		
Count		
Detox Cleanse	25,830	30-Jun-24
Capsules 30 Count		
Garcinia Gambogia	0	
Capsules 60 Count		
Biotin Capsules 340	5,796	31-May-24
Mg 60 Count		
Nighttime Gummies	37,125	30-Aug-24
with Melatonin		
18Mg 30 Count		
Zinc Liquid Drops	105,624	30-Jul-24
225Mg 30mL		

(collectively, the "TL Assets").

V. <u>Sale through Private Sale But With Deadline for Higher Bids and Auction (If Necessary); Description of Offer; Bidding Procedures</u>

A. Sale

authority to sell to Purchaser. If another bidder timely submits a higher and better offer ("Higher Bidder") than the Debtors shall seek authority through a separate motion to sell to the Higher Bidder with Purchaser as a backup purchaser. The Debtors determined that it would be in the best interests of their creditors and their estates to maximize the value of their assets through a sale of the Assets prior to the finished product becoming unsaleable without significant expense spent for retesting the product and in advance of the expiration dates. Absent such a sale at this time, the Debtors believe they would achieve less for creditors as a result of the perishable nature of the Debtors' finished product and other related costs for retesting and relabeling of the Assets.

B. Description of Offer

- 12. The Debtors received an offer (the "Offer") from Arete E-Commerce Group, LLC (the "Purchaser") to purchase the EH Assets and the TL Assets (collectively, the "Assets"), free and clear of any and all liens, claims, and encumbrances, except for the Assumed Obligations outlined herein.
- 13. Purchaser has agreed to purchase the Assets for a total purchase price of \$375,000.00 (the "Purchase Price"), consisting of one bid at \$262,500.00 for the EH Assets and one at \$112,500.00 for the TL Assets. In addition, Lease will be assumed by Eagle Hemp and assigned to the Purchaser at closing (the "Assumed Obligations").
- 14. Except for the Assumed Obligations, the Purchaser shall have no liability or assume any other obligations of the Debtors arising under or related to any of the Assets on account of the sale. The Assets will be sold "As-Is" "Where-Is" with no representations or warranties of any kind. The Assets will be sold free and clear of all liens, claims, and encumbrances, except the Assumed Obligations.
 - 15. The Offer is a cash offer, with no financing contingency.
- 16. Missy Atkins, a current employee of Eagle Hemp and the wife of Barry Atkins, President of the Debtors, is the sole member of Adventure Ventures, LLC, which is the sole member of the Purchaser.

C. <u>Bidding Procedures</u>

17. The Purchaser's Offer is subject to higher and better bids. The Debtors propose the bid procedures set forth below in order for a higher bidder to submit an eligible bid. The bid procedures are as follows:

- (a) <u>Court Approval of Sale</u>. The Debtor requests the Court to approve the sale to the Purchaser subject only to higher bids received by the Bid Deadline (defined below). The sale to Purchaser will be conditioned only on the receipt of a higher bid by the Bid Deadline. Absent receipt of any qualified higher bid, the sale order will be valid and legally enforceable.
- (b) <u>"AS-IS"</u>. The Assets will be sold "As-Is" with no representations or warranties of any kind. All sale proceeds shall be remitted to Stichter Riedel to be held in trust and distributed pursuant to a confirmed Chapter 11 plan or by order of this Court.
- (c) <u>Consent of Secured Creditors</u>. The Secured Creditors consent to the relief requested herein.
- (d) <u>Sale Order</u>. The sale of the Assets will be subject to higher bids which must be received no later than fifteen (15) calendar days after the date of the order approving the sale ("**Sale Order**") to Purchaser. The sale to Purchaser will be conditioned upon receipt of a qualifying higher and better offer. Higher bids must be received by 5:00 P.M. on the 15th calendar day after the order approving the sale is entered ("**Bid Deadline**").
- (e) <u>No Qualifying Bids</u>. If no qualifying higher bid is received, the Debtors shall promptly file a notice with the Court indicating that the Sale Order is final, and Purchaser is the owner of the Assets.
- (f) <u>Qualifying Bid</u>. A qualifying bid must be received timely prior to the Bid Deadline.
- (g) <u>Auction if Qualifying Bid Received</u>. If a qualifying bid is received, Debtors' counsel shall be authorized to conduct an auction (the "Auction") at its offices located at 110

- E. Madison Street, Suite 200, Tampa, Florida 33602 and at a time designated by Debtor's counsel within seven (7) calendar days of the Bid Deadline and promptly file a notice and motion to approve the sale to the party that is selected the highest bidder ("**Highest Bidder Sale Order**"). The Debtors shall be authorized to immediately close with the highest bidder after entry of the Highest Bidder Sale Order.
- (h) <u>Sale Proceeds</u>. All sale proceeds shall be remitted to Stichter Riedel to be held in trust and distributed pursuant to a confirmed Chapter 11 plan or by order of this Court.
- (i) <u>Credit Bid.</u> Notwithstanding the Secured Creditors' consent to the relief herein, the Secured Creditors shall retain their rights to credit bid at any Auction in accordance with Section 363(k) of the Bankruptcy Code.
- (j) <u>Additional Terms</u>. The sale of the Assets shall be consummated by delivery to the Purchaser or highest bidder of a bill of sale signed by the Debtors. In addition, the parties shall execute an Assumption and Assignment Agreement whereby the Purchaser or higher b

Relief Requested

A. The Court should approve the sale of the Assets.

18. By this Sale Motion, the Debtors request that this Court, pursuant to §§ 363(b), (f) and (m) of the Bankruptcy Code and Rule 6004 of the Bankruptcy Rules, approve the Offer and the sale of the Assets to the Purchaser (or such higher and better bids received at the Auction, if any) free and clear of all Encumbrances, except the Assumed Obligations.

- 19. Section 363(b)(1) states that the "trustee, after notice and a hearing, may use, sell, or lease, other than in the ordinary course of business, property of the estate." 11 U.S.C. § 363(b)(1). Courts usually defer to the business judgment of a debtor in deciding whether or not to authorize a debtor to sell property outside the ordinary course of business. See e.g., *In re Continental Airlines*, *Inc.*, 780 F.2d 1223 (5th Cir. 1986); *In re Lionel Corp.*, 722 F.2d 1063, 1071 (2nd Cir. 1983); *In re Mason's Nursing Center, Inc.*, 73 E.R. 360, 362 (Bankr. S.D. Fla. 1987).
- 20. The standard applicable to a motion under Section 363(b)(1) of the Bankruptcy Code is whether the proposed sale serves a sound business purpose. *In re BDK Health Management*, 1998 WL 34188241, *5 (Bankr. M.D. Fla. 1998). To determine whether this standard is satisfied, bankruptcy courts have considered whether: (1) there is any improper or bad faith motive, (2) price is fair and the negotiations or bidding occurred at arm's length, (3) there has been an adequate procedure, including proper exposure to the market and accurate and reasonable notice to all parties in interest. *In re Gulf States Steel Inc. of Alabama*, 285 B.R. 497, 514 (Bankr. N.D. Ala. 2002).
- 21. Subject to the terms and conditions of the Offer, the Debtors, in the sound exercise of their business judgment, have concluded that consummation of the sale will best maximize the value of the Debtors' estates for the benefit of the Debtors' creditors. The finished product of both Eagle Hemp and Trim Life are perishable in nature and have expiration dates that are primarily approaching mid-next year and would necessitate retesting, thereby significantly reducing the value of these items. The Debtors are unable to sell the product on a retail basis due to continued lack of credit card processing. The Offer put forward by the Purchaser provides for the Purchaser assuming Eagle Hemp's expenses related to the Lease, thereby relieving the Debtors' estates from these administrative costs.

22. To ensure the highest possible recovery for the Debtors' estates but given the perishable nature of certain of the assets and current limited cash levels, the Debtors propose the sale of the Assets be subject to the bid procedures outlined above. The Debtors respectfully assert that ample business justification exists for the sale.

B. The requirements of § 363(f) are met.

- 23. Pursuant to Section 363(f) of the Bankruptcy Code, the Debtors will sell the Assets free and clear of all liens, claims and encumbrances, and interests, including, without limitation, any successor liability claims, except the Assumed Obligations. The Debtors seek an order that the contemplated sale of the Assets to the Purchaser (or such higher and better bids received at the Auction, if any) be free and clear of all liens, claims and encumbrances, other than the Assumed Obligations. The Debtors propose that any liens transfer and attach to the sale proceeds with the same validity, priority, force and effect that such liens had on the Assets immediately prior to the Closing.
- 24. As to the EH Assets, Eagle Hemp's secured obligations are comprised of amounts due and owing to (i) George L. Southworth Revocable Trust Dated February 17, 2006, as Amended (the "GLS Trust") and (ii) 3KS Family, LLLP ("3KS"). GLS Trust is owed approximately \$16.9 million based on a loan made to Eagle Hemp. 3KS is owed approximately \$4 million based on a loan made to Eagle Hemp. Each of GLS Trust and 3KS assert a lien on all of the EH Assets, including but not limited to inventory, personal property, and accounts receivable.
- 25. GLS Trust and 3KS (together, the "**Secured Creditors**") have consented to the sale of the EH Assets, with the sale proceeds to be subject to Secured Creditors' liens to the same extent,

validity and priority as existed on the Petition Date and held by Stichter Riedel and to be distributed pursuant to the confirmed Chapter 11 plan or by order of this Court.

- 26. As to the TL Assets, there is no secured debt. Similarly, the sale proceeds from the TL Assets will be held by Stichter Riedel and be distributed pursuant to a confirmed Chapter 11 plan or by order of this Court.
- 27. Pursuant to section 363(f) of the Bankruptcy Code, a debtor in possession may sell property of the estate "free and clear of any interest in such property of an entity other than the estate" if any one of the conditions in the subsection is satisfied. Section 363(f) allows a debtor or trustee to sell assets of a bankruptcy estate free and clear of liens, with secured claims attaching to the proceeds of such sale. The Debtor proposes that the sale is the best mechanism to allow the Debtors' creditors to receive the highest and best recovery on their claims. Here, the sale of the EH Assets satisfies Section 363(f)(2) because the Secured Creditors consent to the sale.
- 28. Section 363(f) authorizes the sale free and clear of any successor liability claims. "It is the express language of section 363(f) that allows the sale of these assets free and clear of the successor liability claim of [a claimant], something that is not available outside of bankruptcy." *In re Ormet Corp.*, No. 13-10334, 2014 WL 3542133, at *3 (Bankr. D. Del. July 17, 2014). Further, "the term 'any interest' as used in § 363(f) is sufficiently elastic" and "authorize[s] a bankruptcy court to bar any interest that could potentially travel with the property being sold." *PBBPC, Inc. v. OPK Biotech, LLC*, 484 B.R. 860, 869 (B.A.P. 1st Cir. 2013) (internal citations omitted).
- 29. The Debtors propose that as to sale of the EH Assets be free and clear of any liens, claims, or encumbrances of the Secured Creditors' claim (the "Secured Claims"), which liens,

claims, or encumbrances of the Secured Claims shall attach to the sale proceeds to the same extent, validity, and priority as existed on the Petition Date.

C. The Court should find that the Purchaser or Higher Bidder is a "good faith purchaser" under §363(m).

- 30. The Debtors request that this Court find, at the sale hearing, that the Purchaser (or such higher and better bids received at the Auction, if any) is a good-faith purchaser entitled to the protections of Section 363(m) of the Bankruptcy Code. The Debtors further request that, after the sale hearing, this Court enter the Sale Order authorizing and approving the offer put forward by the party as having submitted the highest and best bid (to the extent another bidder, the "Successful Bidder") and designating, if any, the party approved by the Court as having submitted the second highest bid (the "Backup Bidder"), and authorizing the Debtors' execution of, a bill of sale, an assumption and assignment agreement, and any other necessary documents to consummate the sale.
- 31. The Purchaser is a Delaware limited liability company whose sole member is Adventure Ventures, LLC. Missy Atkins is the sole member of Adventure Ventures, LLC and is the President of the Purchaser. Mrs. Atkins is currently an officer of Eagle Hemp and is the wife of Barry Atkins, President of the Debtors. The Debtors request that the Sale Order find that the Purchaser (or the Successful Bidder or Backup Bidder as applicable) is a good-faith purchaser entitled to protections of Bankruptcy Code § 363(m).
- 32. For all of the reasons set forth in this Sale Motion, the Debtors, through the exercise of their business judgment, have determined that the sale of the Assets to the Purchaser and the other transactions set forth in the Offer are in the best interests of the Debtors, their creditors, and their estates. The Debtors have determined that the proposed sale is in the best interests of the estates.

Moreover, the proposed sales are subject to higher and better offers which will ensure that the price is fair and reasonable.

D. Assumption and Assignment of Contracts

- 33. By this Sale Motion, the Debtors also seek, pursuant to Sections 365(a) and (b)(1) of the Bankruptcy Code, authority to assume and/or assign to the Purchaser (or the Successful Bidder or Backup Bidder as applicable) all of their right, title and interest in and to the Lease free and clear of all liens, claims, and encumbrances. The Debtors' assumption and/or assignment to the Purchaser (or the Successful Bidder or Backup Bidder as applicable) of the Lease is conditioned upon the approval of this Court and the closing of the transactions contemplated by the Offer as well as the resolution of any objections to such assumption and/or assignment filed with the Court. The Purchaser (or the Successful Bidder or Backup Bidder as applicable) will provide adequate assurance of future performance of these obligations under the offer.
- 34. The Debtors believe that the Purchaser will be able to perform its obligations under the Lease following the closing under the Offer, and that the assumption and/or assignment to the Purchaser of the Lease is in the best interest of the Debtors, their creditors and their estates in that it will relieve the Debtors of additional claims and obligations under the Lease. The Purchaser is willing to undertake performance of the Lease upon the Closing of, and subject to the terms and conditions of, the Offer, conditioned upon the Court's approval of the assumption and/or assignment of the Lease and Closing on the Offer.

E. Notice and Shortening Time

35. A copy of this Sale Motion is being served on (a) all creditors, (b) the Secured Creditors, and (c) the Landlord to the Lease. Certain of the creditors may know third parties that would be interested in the Assets and making an offer as to same; parties may contact Debtor's

counsel in order for a copy of this Motion to be served on such third-party. The Debtors request

that the Court enter an order finding that such notice of this Sale Motion is adequate and sufficient

and complies with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of this Court.

36. At the Sale Hearing, the Debtors will request that the Court enter an order waiving the

14-day stays set forth in Rules 6004(g) and 6006(d) of the Bankruptcy Rules and providing that the

order granting this Sale Motion be immediately enforceable and that the closing to the Purchaser or

higher bidder, if applicable, may occur immediately. The Debtors' financial condition is such that a

closing needs to occur as quickly as is practicable, and therefore good cause exists to waive the

applicable stay periods.

WHEREFORE, the Debtors respectfully request entry of an order granting the relief

requested herein, and for such other and further relief as is just and proper.

/s/ Elena Paras Ketchum

Elena Paras Ketchum (FBN 0129267)

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Attorneys for Debtors

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Debtors' Motion for

Order Authorizing, Subject to Higher and Better Offers, (I) the Sale of the Debtors' Perishable

Finished Product and Raw Materials Pursuant to 11 U.S.C. § 363, Free and Clear of All Liens,

Claims and Encumbrances and (II) the Assumption and Assignment of Lease was furnished on

December 18, 2023 by the Court's electronic noticing system, and on December 19, 2023 by U.S.

Mail to all creditors on the Court's mailing matrix for each Debtor, counsel for the Secured

Creditors, and counsel for the Landlord.

/s/ Elena Paras Ketchum

Elena Paras Ketchum

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Case 8:23-bk-04137-RCT Middle District of Florida

Mon Dec 18 16:15:19 EST 2023

11317 N. 52nd St. Tampa, FL 33617-2133

3KS Family, LLLP

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Colwill Engineering Electrical Inc. 4750 East Adamo Dr Tampa, FL 33605-5916 Colwill Engineering Mechanical 4750 East Adamo Dr Tampa, FL 33605-5916

Colwill Engineering Technologies, Inc 4750 East Adamo Dr Tampa, FL 33605-5916

Concrete Impressions of Florida, Inc P.O. Box 292782 Tampa, FL 33687-2782 Convert2Media LLC 4700 Millenia Blvd., Ste. 175-B Orlando, FL 32839-6015

Convert2Media, LLC 44 Exchange Place Salt Lake City, UT 84111-2713

Cox Fire Protection, Inc 7910 Professional Place Tampa, FL 33637-6746 Crown Equipment Corp, dba Crown Lift Trucks c/o Robert Hanseman Sebaly Shillito + Dyer LPA 40 N Main St, Suite 1900 Dayton OH 45423-1013 Crown Lift Trucks 4683 Oak Fair Blvd Tampa, FL 33610-7410

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Eagle Hemp, LLC Trim Life Labs, LLC 8:23-bk-4138-RCT (Jointly Administered) P.O. Box 16605 Tampa, FL 33687-6605 Eagle Labs, Inc 10540 72nd St Seminole, FL 33777-1512 Elaine Solomon 9208 Springhill Lane, #102 Upper Marlboro, MD 20772

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Gary W. Rich, Esq. Law Office of Gary W. Rich, LC 438 Fountain View Morgantown, WV 26505-3848 George L. Southworth Revocable Trust Dated February 17, 2006, Am 11317 N. 52nd St. Tampa, FL 33617-2133 George L. Southworth Revocable Trust Dated F c/o Bush Ross, P.A.
Attn: Adam L. Alpert
P.O. Box 3913
Tampa, FL 33601-3913

Case 8:23-bk-04137-RCT Doc 54 Filed 12/18/23 George L. Southworth Revocable Trust utd 2/1 Adam M Gilbert

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Page 18 of 21 GrabAds Media, LLC

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Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

JWC Environmental

2850 S. Red Hill Ave., #125

Santa Ana, CA 92705-5541

Jello Management, Inc. 16192 Coastal Hwy.

Lewes, DE 19958-3608

Elena P Ketchum

Stichter, Riedel, Blain & Postler, P.A.

110 E. Madison St., Suite 200

Tampa, FL 33602-4718

KorDev, LLC Kordev, LLC

c/o Lara Roeske Fernandez, Esq. 101 East Kennedy Blvd

Suite 2700

L.L.C., Inc.

PO Box 16966

Tampa, FL 33602-5150

Tampa, FL 33687-6966

c/o Tillman James Finley, Esq. Marino Finley LLP 818 Connecticut Ave NW, #801

Washington, DC 20006-2724

Kount

PO Box 71221

Charlotte, NC 28272-1221

Lakeland Interstate Business Center LLC c/o Bilzin Sumberg Baena Price & Axelrod

1450 Brickell Avenue

23rd Floor

Miami, FL 33131-3456

Lakeland Interstate Business Center LLC c/o Bilzin Sumberg Baena Price & Axelrod

1450 Brickell Avenue, 23rd Floor Miami, Florida 33131-3456

ATTN: Jeffrey I. Snyder, Esq.

Lakeland Interstate Business Center, LLC c/o Equitable Real Estate Partners 1604 Santa Rosa Rd., #203

Lori Vendafreddo c/o CTM Legal Group 77 W. Washington st., #2120 Chicago, IL 60602-2995

Maine Revenue Services

P.O. Box 1060

Augusta, ME 04332-1060

Marlin Business Bank PO Box 13604

Henrico, VA 23229-5008

Philadelphia, PA 19101-3604

Massachusetts Department of Revenue Resolution - Bankruptcy Unit

P.O. Box 7090

Boston, MA 02204-7090

Media Brand Consulting 2338 Coronada Way S.

St. Petersburg, FL 33712-4136

Merchant eSolutions, Inc. c/o Frank N. White, Esq. Arnall Golden Gregory LLP 171 17th Street NW, Suite 2100

Atlanta, GA 30363-1031

MerchantE

1150 Sanctuary Parkway, #300 Alpharetta, GA 30009-4852

Milner, Inc. PO Box 923197

Norcross, GA 30010-3197

Missy Atkins P.O. Box 4363

West Palm Beach, FL 33402-4363

Metrics Call Services 701 S. Howard Ave., #106 Tampa, FL 33606-2473

Case 8:23-bk-04137-RCT Doc 54 Filed 12/18/23

4700 Millenia Blvd., Ste. 175-A Orlando, Florida 32839-6015

6052 Turkey Lake Rd., Suite 200 Orlando, FL 32819-4219

Page 19 of 21
Megan Wilson Murray
Underwood Murray PA
100 North Tampa Street, Suite 2325
Tampa, FL 33602-5842

Nick Ripplinger 802 Knight St Seffner, FL 33584-3951

Mobooka LLC

Omni Tax 2300 5th Ave. Vero Beach, FL 32960-5169 One Independent Dr. Suite 1400 Jacksonville, FL 32202-5011

Polk County Tax Collector P.O. Box 1189 Bartow, FL 33831-1189 RCS Company of Tampa, Inc PO Box 89129 Tampa, FL 33689-0402 Reimagine Office Furnishings 1212 N 39th St., Suite 100 Tampa, FL 33605-5899

Harley E Riedel
Stichter Riedel Blain & Postler, P.A.
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Silver Ladder Media LLC 1367 Ashford Ave Number 319 San Juan, PR 00907 Jeffrey I Snyder
Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Avenue, Suite 2300
Miami, FL 33131-3456

Spectrum 400 Atlantic St., 10th Floor Stamford, CT 06901-3512

State of Florida - Department of Revenue Post Office Box 6668 Tallahassee, Florida 32314-6668 Stichter, Riedel, Blain & Prosser, P.A. 110 Madison Street-Ste 200 Tampa, FL 33602-4718 Sunbelt Rentals, Inc. PO Box 409211 Atlanta, GA 30384-9211

Synergy Digital 4136 Unon St. Buraby British Columbia V5C2X1 Canada (p)T MOBILE C O AMERICAN INFOSOURCE LP 4515 N SANTA FE AVE OKLAHOMA CITY OK 73118-7901 Terminix PO Box 802155 Chicago, IL 60680-2155

The Affiliati Network, LLC c/o Megan W. Murray
Underwood Murray, P.A.
100 N. Tampa St., Suite 2325
Tampa, FL 33602-5842

Trim Life Labs, LLC P.O. Box 16605 Tampa, FL 33687-6605 UPS P O Box 650116 Dallas, TX 75265-0116

Uline 12575 Uline Drive Pleasant Prairie, WI 53158-3686 Uline, Inc PO BOX 88741 Chicago, IL 60680-1741 United States Trustee - TPA Timberlake Annex, Suite 1200 501 E Polk Street Tampa, FL 33602-3949 Wisconsin Department of Revenue

P.O. Box 8902

Madison, WI 53708-8902

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

ADT Security Services 1501 Yamato Rd. Boca Raton, FL 33431 Hillsborough County Tax Collector 2506 N. Falkenburg Rd. Tampa, FL 33619

Illinois Department of Revenue P.O. Box 19043 Springfield, IL 62794-9043

Indiana Department of Revenue 100 N. Senate Ave. Indianapolis, IN 46204-2253 T-Mobile P.O. Box 53410 Bellevue, WA 98015-3410

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Aware Ads, Inc. c/o DLA Piper (Canada) 1 First Canadian Place 100 King St. West, #6000 Toronto ON M5X 1E2 Canada, (d)Colwill Engineering Electrical, Inc.
4750 East Adamo Drive
Tampa, FL 33605-5916

(d)Colwill Engineering, Mechanical, Inc. 4750 East Adamo Drive Tampa, FL 33605-5916

(d)Trim Life Labs, LLC P.O. Box 16605 Tampa, FL 33687-6605 End of Label Matrix
Mailable recipients 120
Bypassed recipients 4
Total 124

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501 Roberts Court Nw

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Label Matrix for local noticing

113A-6

Kennesaw, GA 30144-4968

Post Office Box 533987 Orlando, FL 32853-3987

Middle District of Florida Orlando

Case 6:23-bk-04138-LVV

Mon Dec 18 16:28:24 EST 2023

(p) JPMORGAN CHASE BANK N A BANKRUPTCY MAIL INTAKE TEAM 700 KANSAS LANE FLOOR 01

Citibank, N.A. P.O. Box 1608

Southgate, MI 48195-0608

Florida Department of Revenue

Bankruptcy Unit Post Office Box 6668 Tallahassee FL 32314-6668

Florida Dept of Revenue

MONROE LA 71203-4774

P.O. Box 6668

Tallahassee, FL 32314-6668

IRS

Centralized Insolvency Operations

P.O. Box 7346

Philadelphia, PA 19101-7346

Internal Revenue Service Post Office Box 7346 Philadelphia PA 19101-7346

(p) DSNB MACY S CITIBANK

1000 TECHNOLOGY DRIVE MS 777 O FALLON MO 63368-2239

Kateryna McCaleb Tejes Law, PLLC

7212 Curry Ford Road, Building 3

Orlando, FL 32822-5806

Kateryna McCaleb Upright Law, LLP

7212 Curry Ford Road, Building 3

Orlando, FL 32822-5806

Mohela/Dept. of Educ. 633 Spirit Drive

Chesterfield, MO 63005-1243

Orange County Tax Collector

PO Box 545100

Orlando FL 32854-5100

Barbara Mae Rose 1422 Carriage Oak CT Ocoee, FL 34761-1441

Stephen Michael Rose 1422 Carriage Oak CT

Ocoee, FL 34761-1441

United Collection Bureau 5620 Southwyck Boulevard

Suite 206

Toledo, OH 43614-1501

United States Trustee - ORL7/13 Office of the United States Trustee George C Young Federal Building 400 West Washington Street, Suite 1100

Orlando, FL 32801-2210

Wells Fargo Bank, N.A. P.O. Box 5129

Sioux Falls, SD 57117-5129

Wells Fargo/Dillards Attn: Bankruptcy

P.O. Box 10438 Mac F8235-02f Des Moines, IA 50306-0438

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Chase Card Services Attn: Bankruptcy P.O. 15298

Wilmington, DE 19850

Macys/FDSB Attn: Bankruptcy 9111 Duke Boulevard Mason, OH 45040

End of Label Matrix Mailable recipients 19 Bypassed recipients 0 Total 19